

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IBEW LOCAL 90 PENSION FUND, On	:	Civil Action No. 11-cv-04209-KBF-JCF
Behalf of Itself and All Others Similarly	:	
Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	LEAD PLAINTIFFS' AND IBEW LOCAL 90
	:	PENSION FUND'S NOTICE OF MOTION
vs.	:	AND MOTION FOR CLASS
	:	CERTIFICATION AND TO INCLUDE
DEUTSCHE BANK AG, et al.,	:	IBEW LOCAL 90 PENSION FUND AS A
	:	NAMED PLAINTIFF
Defendants.	:	
_____	X	

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that IBEW Local 90 Pension Fund, Building Trades United Pension Trust Fund, the Steward Global Equity Income Fund and the Steward International Enhanced Index Fund (collectively, the “Funds” or “Lead Plaintiffs”), will move the Honorable Katherine B. Forrest, United States District Court Judge for the Southern District of New York, on October 4, 2013, at 11:00 a.m. or at such other time as may be designated by the Court, at 500 Pearl Street, New York, NY 10007, for an order: (1) certifying the class as defined in the Memorandum of Law; (2) appointing the Funds as class representatives; (3) appointing Robbins Geller Rudman & Dowd LLP as class counsel; and (4) to include IBEW Local 90 Pension Fund as a named plaintiff.

In support of this motion, Lead Plaintiffs submit the accompanying documents:

- Lead Plaintiffs’ and IBEW Local 90 Pension Fund’s Memorandum of Law in Support of the Motion for Class Certification and to Include IBEW Local 90 Pension Fund as a Named Plaintiff;
- Declaration of Declaration of Michael A. Marek;
- Declaration of Ashley M. Price in Support of Lead Plaintiffs’ and IBEW Local 90 Pension Fund’s Motion for Class Certification and to Include IBEW Local 90 Pension Fund as a Named Plaintiff; and
- [Proposed] Order Granting Lead Plaintiffs’ and IBEW Local 90 Pension Fund’s Motion for Class Certification and to Include IBEW Local 90 Pension Fund as a Named Plaintiff.

DATED: July 1, 2013

ROBBINS GELLER RUDMAN
& DOWD LLP
JOHN K. GRANT

s/ John K. Grant
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Additional Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 1, 2013.

s/ John K. Grant
JOHN K. GRANT

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Mailing Information for a Case 1:11-cv-04209-KBF

Electronic Mail Notice List

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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